

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

13 MAR 1985

S. Michael Tymiak, P.E.
Manager, Previously Operated Properties
Environmental Resources
Koppers Company, Inc.
1940 Koppers Building
436 Seventh Avenue
Pittsburgh, PA 15219

Re: South Cavalcade site

Dear Mr. Tymiak:

An issue was recently brought to my attention which I would like to discuss with you. At both the Texarkana site and the South Cavalcade site the Environmental Protection Agency (EPA) has tasked Camp, Dresser and McKee (CDM) to conduct compliance monitoring activities. Basically, CDM's role has been one of eyes and ears for EPA. The compliance monitoring activities have gone smoothly at the Texarkana site and I understand that in many instances Koppers has benefited from having a CDM person onsite.

At the South Cavalcade site, compliance monitoring activities have not gone as smoothly. Our contractor has indicated two types of problems: scheduling and data availability. First, CDM has documented a number of instances where Koppers' contractor either did not provide adequate notice (48 hours) of activities or provided incorrect information concerning the scheduling of activities. Second, CDM has documented difficulty in obtaining information from Koppers contractor. Section X of the CERCLA Administrative Order on Consent VI-8-85 established open lines of data sharing; this understanding was further strengthened by Koppers' personal commitment concerning openness (Koppers is to be commended for their openness at the Texarkana site).

Some of these problems can be attributed to the dynamic nature of the field program (i.e. difficulty of scheduling more than a few days at a time). Another portion of the problems might be attributed to the fact that, at times, competition between CDM and McBride-Ratcliff has approached adversarial proportions. EPA does not believe that these explanations account for all the problems that CDM has encountered. Koppers must educate their contractor to the fact that openness and data sharing are mandated when Potentially Responsible Parties are conducting the RI/FS under EPA oversight.

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It is my understanding that our staffs have discussed these problems. Further, it is my understanding that conditions have improved since CDM documented their complaints. Should these problems occur again, EPA would like to meet with Koppers in Dallas to discuss possible solutions to these problems. Should you have any questions please contact John at (214) 767-9700.

Sincerely yours,

Larry D. Wright, Chief
Superfund Enforcement Section

cc: S. Craig, Koppers
C. Faulds, TWC
R. Kier, CDM
R. Tobin, MRA

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